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January 31, 1996

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Mr. William F. Caton Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

**EX PARTE** 

Toll Free Access Codes, CC Docket No. 95-155

Dear Mr. Caton:

Re:

This letter, filed in original with two duplicates, reports that the attached letters were hand-delivered to all Commissioners' offices on January 31, 1996. The letters address the need for rules to protect users of mnemonic toll free 800 numbers from the harm that will result if parallel numbers are assigned to others when the 888 service access code becomes available later this year.

If you have any questions regarding this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

Laura Pholips

Laura H. Phillips

LHP/css Enclosure

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January 29, 1996

## VIA AIRBORNE OVERNITE

The Honorable Reed E. Hundt Chairman Federal Communications Commission 1919 M Street N.W. Washington, D.C. 20554

Re: Toll Free Access Code

CC Docket No. 95-155

WRITTEN EX PARTE PRESENTATION

Dear Chairman Hundt:

Charter Medical Corporation ("Charter") is an international health care provider specializing in the diagnosis and treatment of addictive diseases and psychiatric disorders. Like many other companies, Charter uses a mnemonic toll free 800 number -- 1/800-CHARTER -- in its business. That number is vital to Charter's business and serious consequences could arise from confusion between Charter's 800 number and the parallel 888 number that soon will become available. At the same time, new evidence shows that protecting current holders of mnemonic 800 numbers will have a minimal impact on the 888 code. Consequently, Charter urges you to support the adoption of rules to protect 800 users with special interests in their numbers from having the parallel numbers assigned to others when the 888 service access code becomes available later this year.

As Charter described in its comments in this proceeding, 1-800-CHARTER is used to providing callers with easy access to its clinical staff 24 hours a day, seven days a week. Callers receive free clinical assessments and referrals to the most appropriate treatment options within their communities. This number now receives nearly one million calls a year.

Since initiating the 1-800-CHARTER service, Charter has built a reputation for being available at any time to people who need mental health treatment through this mnemonic telephone number. As a result, the easy, prompt availability of service through that number is important not only to Charter as a company, but to many Americans seeking treatment for mental illness or substance abuse.

The Honorable Reed E. Hundt January 29, 1996 Page Two

The introduction of the 888 service access code poses significant risks to the value of mnemonic numbers such as 1-800-CHARTER. If 1-888-CHARTER is assigned to another company, there is a significant likelihood of confusion between the current 800 number and the new 888 number. This could have serious consequences for people in distress who want to reach 1-800-CHARTER for assessments and referrals. At the same time, Charter is likely to lose much of its investment in the development of 1-800-CHARTER as the number to call for mental health assistance.

Charter's situation is repeated many times over throughout American industry. While relatively few companies offer the kinds of crisis services that Charter provides, there are thousands of mnemonic 800 numbers in use today. Providing the companies that hold those numbers with the opportunity to prevent assignment of the parallel 888 numbers to other entities will protect the often significant investments that have been made in promoting their current 800 numbers. Protecting current mnemonic 800 numbers will reduce customer confusion resulting from misdialing. Such protection also could prevent unnecessary costs to users of 888 numbers, who otherwise could end up paying for thousands (or even millions) of calls from people who mistakenly dial their numbers when they mean to dial heavily used mnemonic 800 numbers. Thus, protecting current mnemonic 800 numbers from parallel assignments of 888 numbers will create significant benefits for consumers and toll-free service subscribers alike.

Moreover, a recent analysis has shown that providing protection for current holders of mnemonic numbers will not have a significant impact on the usage or lifespan of the 888 code. As described in *Communications Daily* on January 11, a survey shows that, in fact, only three percent of all 800 numbers now in service are used as mnemonic numbers. Thus, even if every single mnemonic number were reserved, there would be only a minimal impact on the life of the 888 code or other future codes. When this small cost is weighed against the important benefits of protecting current mnemonic 800 numbers, it is apparent that protection is warranted. For these reasons, Charter urges the Commission to adopt rules in this proceeding that will give current holders of mnemonic 800 numbers a fair opportunity to protect themselves from assignment of parallel numbers in the 888 code.

In accordance with Section 1.1206 of the Commission's Rules, two copies of this letter are being filed with the Secretary's office on this date. Please inform me if any questions should arise in connection with this letter.

Respectfully submitted,

David R. Tatum
Assistant Vice President
Government Relations



January 29, 1996

Commissioner Rachelle Chong Federal Communidations Commission 1919 M Street, N.W., Room 844 Washington, D.C. 20554

Re:

Toll Free Access Code CC Docket No. 95-155

WRITTEN EX PARTE PRESENTATION

Dear Commissioner Chong:

Charter Medical Corporation ("Charter") is an international health care provider specializing in the diagnosis and treatment of addictive diseases and psychiatric disorders. Like many other companies, Charter uses a mnemonic toll free 800 number -- 1/800-CHARTER -- in its business. That number is vital to Charter's business and serious consequences could arise from confusion between Charter's 800 number and the parallel 888 number that soon will become available. At the same time, new evidence shows that protecting current holders of mnemonic 800 numbers will have a minimal impact on the 888 code. Consequently, Charter urges you to support the adoption of rules to protect 800 users with special interests in their numbers from having the parallel numbers assigned to others when the 888 service access code becomes available later this year.

As Charter described in its comments in this proceeding, 1-800-CHARTER is used to providing callers with easy access to its clinical staff 24 hours a day, seven days a week. Callers receive free clinical assessments and referrals to the most appropriate treatment options within their communities. This number now receives nearly one million calls a year.

Commissioner Rachelle Chong January 29, 1996 Page Two

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Assistant Vice President

Government Relations



January 29, 1996

Commissioner Susan Ness Federal Communidations Commission 1919 M Street, N.W., Room 832 Washington, D.C. 20554

Re: Toll Free Access Code

CC Docket No. 95-155

WRITTEN EX PARTE PRESENTATION

Dear Commissioner Ness:

Charter Medical Corporation ("Charter") is an international health care provider specializing in the diagnosis and treatment of addictive diseases and psychiatric disorders. Like many other companies, Charter uses a mnemonic toll free 800 number -- 1/800-CHARTER -- in its business. That number is vital to Charter's business and serious consequences could arise from confusion between Charter's 800 number and the parallel 888 number that soon will become available. At the same time, new evidence shows that protecting current holders of mnemonic 800 numbers will have a minimal impact on the 888 code. Consequently, Charter urges you to support the adoption of rules to protect 800 users with special interests in their numbers from having the parallel numbers assigned to others when the 888 service access code becomes available later this year.

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Commissioner Susan Ness January 29, 1996 Page Two

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Respectfully submitted,

David R. Tatum Assistant Vice President

Government Relations



January 29, 1996

Commissioner Andrew C. Barrett Federal Communidations Commission 1919 M Street, N.W., Room 844 Washington, D.C. 20554

Re

Toll Free Access Code CC Docket No. 95-155 WRITTEN EX PARTE PRESENTATION

Dear Commissioner Barrett

Charter Medical Corporation ("Charter") is an international health care provider specializing in the diagnosis and treatment of addictive diseases and psychiatric disorders. Like many other companies, Charter uses a mnemonic toll free 800 number -- 1/800-CHARTER -- in its business. That number is vital to Charter's business and serious consequences could arise from confusion between Charter's 800 number and the parallel 888 number that soon will become available. At the same time, new evidence shows that protecting current holders of mnemonic 800 numbers will have a minimal impact on the 888 code. Consequently, Charter urges you to support the adoption of rules to protect 800 users with special interests in their numbers from having the parallel numbers assigned to others when the 888 service access code becomes available later this year.

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Commissioner Andrew Barrett January 29, 1996 Page Two

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David R. Tatum Assistant Vice President

Government Relations



January 29, 1996

Commissioner James H. Quello Federal Communications Commission 1919 M Street, N.W., Room 802 Washington, D.C. 20554

Re: Toll Free Access Code CC Docket No. 95-155

WRITTEN EX PARTE PRESENTATION

Dear Commissioner Ouello:

Charter Medical Corporation ("Charter") is an international health care provider specializing in the diagnosis and treatment of addictive diseases and psychiatric disorders. Like many other companies, Charter uses a mnemonic toll free 800 number -- 1/800-CHARTER -- in its business. That number is vital to Charter's business and serious consequences could arise from confusion between Charter's 800 number and the parallel 888 number that soon will become available. At the same time, new evidence shows that protecting current holders of mnemonic 800 numbers will have a minimal impact on the 888 code. Consequently, Charter urges you to support the adoption of rules to protect 800 users with special interests in their numbers from having the parallel numbers assigned to others when the 888 service access code becomes available later this year.

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Commissioner James Quello January 29, 1996 Page Two

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